

Exhibit 316

**ED&F
MAN**

E D & F MAN CAPITAL MARKETS LIMITED

Riverside Associates Defined Benefit Plan
5532 Lillehammer Lane
Suite 103
Park City
UT 84098
USA

Dear Stacey Kaminer

Variation to Terms of Business

We refer to our Terms and Conditions for Business (the "Terms") (expressions defined in the Terms have the same meaning in this letter) and in particular Clause 10, Margin Collateral, Default and Termination we advise the following variations to the Terms;

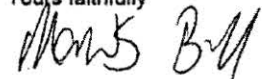
Any cash received in respect of OTC products or to cover DVP transactions and any non-cash assets we hold for you as collateral will be dealt with in accordance with clause 10(b)ii ("Assets Transferred") and will be treated on an Absolute Title Transfer basis.

Separately E D & F Man Capital Markets Limited ("MCM") will revalue your trading account at the close of business in line with the relevant market valuations. At the start of business on the following Business Day our operations staff will review your positions to determine the total amount of your outstanding liabilities to MCM relating to the above specified business and transfer any surplus cash in excess of €1,000 to a segregated cash account also held in your name in accordance with clause 10(b)i. ("Assets Transferred")


Outstanding liabilities include but are not limited to the following, initial margin until such times as positions are closed, fees, commission, interest due and payable, negative variation margin.

Please confirm your receipt, understanding and acceptance of this notice by signing the enclosed copy of this letter and returning it to us in the envelope provided.

Yours faithfully


Marcus Bacchi-Howard

Signed in confirmation of the above variation Terms and Conditions for Business

Signed:  Date: 3/26/12
Print Name: David Schulman Title: TRUSTEE

Cottons Centre
Hay's Lane
London SE1 2QE

Authorized and Regulated by the Financial Services Authority
Registered in England No 1292851

Telephone: +44 (0)20 7089 8000



E D & F MAN CAPITAL MARKETS LIMITED

Riverside Associates Defined Benefit Plan
5532 Lillehammer Lane
Suite 103
Park City
UT 84098
USA

Your New Account and Status: <ELECTIVE PROFESSIONAL>

Thank you for contacting us with regard to opening an account with E D & F Man Capital Markets Limited ("MCM"). In order for us to proceed there is certain information that we need to provide you with to explain and document the terms of MCM's relationship with you.

MCM is authorised and regulated in the UK by the Financial Services Authority (the "FSA"). The FSA requires us to provide you with certain information in accordance with the rules of the FSA (the "FSA Rules"). As such, please ensure you read this letter and the enclosed materials carefully.

We are required by the FSA Rules to categorise you for the purpose of the services that we provide to you. We have determined, based on those rules, that you will be categorised as an "**Elective Professional Client**". As a Professional Client, the FSA Rules state that it is your responsibility to keep us informed of any change that could affect your categorisation and we require you to do so.

In addition, the FSA Rules state that you have the right to request re-categorisation as a Retail Client, whereby you would be entitled to additional protections under the FSA Rules. Please be aware, however, that MCM does not accept Retail Clients and if you ask to be re-categorised as a Retail Client, we would not be able to proceed any further with your application.

It is your responsibility to inform MCM of any changes that could affect your categorisation.

The following documents are attached:

- (i) **MCM's Terms and Conditions of Business**
These Terms and Conditions set out the contractual terms that govern our relationship but are subject to, where relevant, any transaction-specific documentation (e.g. ISDA, GMRA) as entered into between you and us from time to time and as the case may be.
- (ii) **Rate Card**
This sets out our fees and charges (this may be sent under separate cover).
- (iii) **Application Form**

Cottons Centre
Hay's Lane
London SE1 2QE

Authorised and Regulated by the Financial Services Authority
Registered in England No.1292651

Telephone: +44 (0)20 7089 8000



E D & F MAN CAPITAL MARKETS LIMITED

Please

complete this Form and provide the documentation requested in order to verify your identity. A signed and completed Form, including supporting documentation and a signed copy of this cover letter, should be returned to us.

(iv) **MCM's Professional Client Disclosure Document and Order Execution Policy**

These documents outline the main risks that you should be aware of which arise through the different services and investments that we may offer to you and explains the difference in the protections afforded to different client types under the FSA Rules. This risk disclosure is in no way intended to replace the need to seek your own independent advice. The Order Execution Policy sets out the procedures that MCM follows in the execution of your orders, particularly in relation to client order handling and the applicability of best execution. This Policy includes the Risk Disclosure Document.

Any assets, including cash, held or received by us from you or in respect of your account will be dealt with in accordance with clause 10(b) ("Assets Transferred") of our Terms and Conditions. In respect of certain products we may be able to offer you a segregated account and treat money received from you in respect of these products as "client money" subject to the FSA Rules. Please contact us if you require any further information.

You are advised to read the referenced documentation carefully and retain it for your records. If you have any questions about any of the documentation or about your client categorisation, please contact your MCM representative or the Compliance Department.

We look forward to our new business relationship with you.

Yours sincerely

Documentation Department

Cottons Centre
Hay's Lane
London SE1 2QE

Authorised and Regulated by the Financial Services Authority
Registered in England No.1292851

Telephone: +44 (0)20 7089 8000

**ED&F
MAN**

E D & F MAN CAPITAL MARKETS LIMITED

**Confirmation of
Election Statement/FSA Client Categorisation**

I/We hereby request and consent to be categorised by MCM as an Elective Professional client. I/We confirm that I/we have read and understood the Professional Client Disclosure Document and Order Execution Policy.

I/we further confirm to you that I am/we are an experienced and knowledgeable investor, am/are capable of making investment decisions, and understand the risks involved with investing in complex products.

I/we understand that, under the FSA Rules, it is my/our obligation to inform you of any change that could affect my/our categorisation as a Professional client. I/We also understand that it is my/our responsibility to ask MCM for a higher level of protection if I am/we are unable to properly assess or manage the risks involved.

I/we understand that, under the FSA Rules, it is my/our obligation to inform you of any change that could affect my/our categorisation as a Professional client.

I/We confirm that I/We have had sufficient time to consider the implications of being categorised as a Professional Clients including the implications described in your letter.

Signature(s):



Name(s):

DAVID SCHULMAN

Date:

4/17/12

Acknowledgement of ATT Status

I/We acknowledge that my account/s with MCM will be treated as ATT and that I have read and understood the relevant sections of the MCM Terms and Conditions. In addition I acknowledge that MCM does not provide segregation where I/we trade OTC products or have been granted a credit facility.

Signature(s):



Name(s):

DAVID SCHULMAN

Date:

4/17/12

Cottons Centre
Hay's Lane
London SE1 2QE

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E D & F MAN CAPITAL MARKETS LIMITED

Riverside Associates Defined Benefit Plan
5532 Lillehammer Lane
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UT 84098
USA

Dear Stacey Kaminer

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Outstanding liabilities include but are not limited to the following, initial margin until such times as positions are closed, fees, commission, interest due and payable, negative variation margin.

Please confirm your receipt, understanding and acceptance of this notice by signing the enclosed copy of this letter and returning it to us in the envelope provided.

Yours faithfully

Marcus Bacchi-Howard

Signed in confirmation of the above variation Terms and Conditions for Business

Signed:

Date: 3/26/12

Print Name: David Schulman

Title: TRUSTEE

Cottons Centre
Hay's Lane
London SE1 2QE

Authorised and Regulated by the Financial Services Authority
Registered in England No 1292851

Telephone: +44 (0)20 7089 8000

Comrie, Svetlana (LDN)

From: Howard, Marcus (LDN)
Sent: 19 July 2012 07:13
To: Comrie, Svetlana (LDN)
Cc: Foster, Victoria (LDN); Howard, Marcus (LDN)
Subject: RE: Riverside Associates Defined Benefit Plan - correct letters for signing
Attachments: ELECTIVE PROFESSIONAL ACKNOWLEDGEMENT.PDF; VARIATIONS TO TERMS OF BUSINESS.PDF

Hi Svet,

Please find the attached signed.
Kind regards
Marcus



Marcus Howard
Equity Finance

ED&F Man Capital Markets Limited
Cottons Centre, Hay's Lane, London, SE1 2QE
Direct: +44 (0)203 580 7630 | Desk: +44 (0)203 580 7625 | Mobile: +44 (0)7889821409
mhoward@edfmancapital.com | www.edfman.com

From: Comrie, Svetlana (LDN)
Sent: 18 July 2012 17:00
To: Howard, Marcus (LDN)
Cc: Foster, Victoria (LDN)
Subject: Riverside Associates Defined Benefit Plan - correct letters for signing

Marcus, the above needs these (correct) letters to be signed



Thank you!

Svetlana Comrie
Compliance

ED&F Man Capital Markets Limited
Cottons Centre, Hay's Lane, London, SE1 2QE
Direct: +44 (0)203 580 7055
scomrie@edfmancapital.com | www.edfman.com

 Please consider the environment before printing this e-mail

Comrie, Svetlana (LDN)

From: Comrie, Svetlana (LDN)
Sent: 18 July 2012 17:00
To: Howard, Marcus (LDN)
Cc: Foster, Victoria (LDN)
Subject: Riverside Associates Defined Benefit Plan - correct letters for signing
Attachments: Elective Professional SEG HP.pdf; Sweeping letter.pdf

Marcus, the above needs these (correct) letters to be signed

Thank you!

Svetlana Comrie
Compliance

ED&F Man Capital Markets Limited
Cottons Centre, Hay's Lane, London, SE1 2QE
Direct: +44 (0)203 580 7055
 scomrie@edfmancapital.com | www.edfman.com



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E D & F MAN CAPITAL MARKETS LIMITED

Riverside Associates Defined Benefit Plan
5532 Lillehammer Lane
Park City
UT 84098
USA

Your New Account and Status: <ELECTIVE PROFESSIONAL>

Thank you for contacting us with regard to opening an account with E D & F Man Capital Markets Limited ("MCM"). In order for us to proceed there is certain information that we need to provide you with to explain and document the terms of MCM's relationship with you.

MCM is authorised and regulated in the UK by the Financial Services Authority (the "FSA"). The FSA requires us to provide you with certain information in accordance with the rules of the FSA (the "FSA Rules"). As such, please ensure you read this letter and the enclosed materials carefully.

We are required by the FSA Rules to categorise you for the purpose of the services that we provide to you. We have determined, based on those rules, that you will be categorised as an "**Elective Professional Client**". As a Professional Client, the FSA Rules state that it is your responsibility to keep us informed of any change that could affect your categorisation and we require you to do so.

In addition, the FSA Rules state that you have the right to request re-categorisation as a Retail Client, whereby you would be entitled to additional protections under the FSA Rules. Please be aware, however, that MCM does not accept Retail Clients and if you ask to be re-categorised as a Retail Client, we would not be able to proceed any further with your application.

It is your responsibility to inform MCM of any changes that could affect your categorisation.

The following documents are attached:

(i) **MCM's Terms and Conditions of Business**

These Terms and Conditions set out the contractual terms that govern our relationship but are subject to, where relevant, any transaction-specific documentation (e.g. ISDA, GMRA) as entered into between you and us from time to time and as the case may be.

(ii) **Rate Card**

This sets out our fees and charges (this may be sent under separate cover).



E D & F MAN CAPITAL MARKETS LIMITED

(iii) **Application Form**

Please complete this Form and provide the documentation requested in order to verify your identity. A signed and completed Form, including supporting documentation and a signed copy of this cover letter, should be returned to us.

(iv) **MCM's Professional Client Disclosure Document and Order Execution Policy**

These documents outline the main risks that you should be aware of which arise through the different services and investments that we may offer to you and explains the difference in the protections afforded to different client types under the FSA Rules. This risk disclosure is in no way intended to replace the need to seek your own independent advice. The Order Execution Policy sets out the procedures that MCM follows in the execution of your orders, particularly in relation to client order handling and the applicability of best execution. This Policy includes the Risk Disclosure Document.

Any money we receive from you in respect of Exchange-traded products will be treated as "client money" subject to the FSA Rules. Any cash received in respect of OTC products and any non-cash assets we hold for you as collateral will be dealt with in accordance with clause 10(b) ("Assets Transferred") of our Terms and Conditions unless we have expressly agreed with you that such assets are not collateral and should be held in custody, subject to clause 17 ("Custody") of our Terms and Conditions.

You are advised to read the referenced documentation carefully and retain it for your records. If you have any questions about any of the documentation or about your client categorisation, please contact your MCM representative or the Compliance Department.

We look forward to our new business relationship with you.

Yours sincerely

Documentation Department



E D & F MAN CAPITAL MARKETS LIMITED

Confirmation of Election Statement /FSA Client Categorisation

I/We hereby request and consent to be categorised by MCM as an Elective Professional client. I/We confirm that I/we have read and understood the Professional Client Disclosure Document and Order Execution Policy.

I/we further confirm to you that I am/we are an experienced and knowledgeable investor, am/are capable of making investment decisions, and understand the risks involved with investing in complex products.

I/we understand that, under the FSA Rules, it is my/our obligation to inform you of any change that could affect my/our categorisation as a Professional client I/We also understand that it is my/our responsibility to ask MCM for a higher level of protection if I am/we are unable to properly assess or manage the risks involved.

I/we understand that, under the FSA Rules, it is my/our obligation to inform you of any change that could affect my/our categorisation as a Professional client.

I/We confirm that I/We have had sufficient time to consider the implications of being categorised as a Professional Clients including the implications described in your letter.

Signature(s): _____

Name(s): _____

Date: _____

Acknowledgement of Segregated Status

I/We acknowledge that my account/s with MCM will be treated as Segregated and that I have read and understood the relevant sections of the MCM Terms and Conditions. In addition I acknowledge that MCM does not provide segregation where I/we trade OTC products or have been granted a credit facility.

Signature(s): _____

Name(s): _____

Date: _____



E D & F MAN CAPITAL MARKETS LIMITED

Riverside Associates Defined Benefit Plan
5532 Lillehammer Lane
Park City
UT 84098
USA

Dear Sirs

Variation to Terms of Business

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Yours faithfully

Marcus Bacchi-Howard

Signed in confirmation of the above variation Terms and Conditions for Business

Signed: _____

Date: _____

Print Name: _____

Title: _____

Cottons Centre
Hay's Lane
London SE1 2QE

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Telephone: +44 (0)20 7089 8000

Comrie, Svetlana (LDN)

From: Comrie, Svetlana (LDN)
Sent: 17 July 2012 16:40
To: Howard, Marcus (LDN)
Subject: RE: Riverside Associates Defined Benefit Plan

Hi Marcus

As requested enclosed please find classification letter for signature.

POA: thank you

Agreement with Acer: you have provided for other accounts. Also, the IM is not regulated and the IM Agreement helps us validate the relationship, especially now that Acer have more than 5 POAs on our books.

Thanks
Svet

From: Howard, Marcus (LDN)
Sent: 13 July 2012 10:45
To: Comrie, Svetlana (LDN)
Cc: Howard, Marcus (LDN)
Subject: RE: Riverside Associates Defined Benefit Plan

Please see attached POA,

Please send me the classification letter you need signed,
Do you need the Seg letter also.

Re the IM agreement, did we need this for any of the other Acer accounts?

Kind regards
Marcus

Marcus Howard
Equity Finance

ED&F Man Capital Markets Limited
Cottons Centre, Hay's Lane, London, SE1 2QE
Direct: +44 (0)203 580 7630 | Desk: +44 (0)203 580 7625 | Mobile: +44 (0)7889821409
mhoward@edfmancapital.com | www.edfman.com

From: Comrie, Svetlana (LDN)
Sent: 03 July 2012 17:20
To: Howard, Marcus (LDN)
Subject: RE: Riverside Associates Defined Benefit Plan

So the following is missing

- Classification letter
- POA to Acer
- IM Agreement with Acer

From: Howard, Marcus (LDN)
Sent: 03 July 2012 16:43
To: Comrie, Svetlana (LDN)
Subject: RE: Riverside Associates Defined Benefit Plan

Marcus Howard
Equity Finance

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Cottons Centre, Hay's Lane, London, SE1 2QE
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mhoward@edfmancapital.com | www.edfman.com

From: Comrie, Svetlana (LDN)
Sent: 03 July 2012 16:38
To: Howard, Marcus (LDN)
Subject: Riverside Associates Defined Benefit Plan

Marcus, for some reason some docs are not on file, I am sure you have them

- Classification letter
- Sweeping letter
- POA to Acer
- IM Agreement with Acer

These documents were not in your last email to me with POAs and IM Agreements.

Svetlana Comrie
Compliance

ED&F Man Capital Markets Limited
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Direct: +44 (0)203 580 7055
scomrie@edfmancapital.com | www.edfman.com

 Please consider the environment before printing this e-mail

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Subject: RE: Riverside Associates Defined Benefit Plan

Marcus Howard
Equity Finance

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Yours sincerely

Documentation Department



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Signature(s):

Name(s):

Date:

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Signature(s):

Name(s):

Date:

Comrie, Svetlana (LDN)

From: Howard, Marcus (LDN)
Sent: 18 May 2012 15:28
To: Comrie, Svetlana (LDN)
Subject: FW: KYC "Riverside Associates Defined Benefit Plan"
Attachments: 2009 RESTATED RETIREMENT PLAN FOR RSBP.pdf; DSBP NAME CHANGE AMENDMENT TO RABP.pdf; DSBP IRS determination letter.pdf; 2010 Canadian Ltr of Exemption.pdf; 2001 NETHERLANDS EXEMPTION LTR.pdf; DS BILL.pdf

Marcus Howard
Equity Finance

ED&F Man Capital Markets Limited

Cottons Centre, Hay's Lane, London, SE1 2QE
Direct: +44 (0)203 580 7630 | Desk: +44 (0)203 580 7625 | Mobile: +44 (0)7889821409
mhoward@edfmancapital.com | www.edfman.com

From: HOWARD, Marcus (LDN Corporate)
Sent: 11 January 2012 17:21
To: HEATH, Sharon (LDN Corporate)
Cc: HOWARD, Marcus (LDN Corporate); HENSTOCK, Chris (LDN Corporate) (Chris.Henstock@edfman.com); 'steve_hawk@yahoo.com'
Subject: KYC "Riverside Associates Defined Benefit Plan"

Hi Sharon,

Account name: Riverside Associates Defined Benefit Plan
Address: 5532 Lillehammer Lane - Suite 103 Park City, UT 84098

Attached docs:

Retirement plan docs
Name change doc
IRS determination letter
Canada Tax exemption
Netherlands tax exemption
Utility bill

Chasing the client for Photo ID.

Kind regards
Marcus

Comrie, Svetlana (LDN)

From: Stacey Kaminer <SK@acerinvest.com>
Sent: 02 July 2012 17:05
To: Howard, Marcus (LDN)
Subject: RE: Update summary, ACER

To Confirm:

Acer Investment Group LLC has been maintaining documents evidencing who the beneficiary of the Kamco Investments Inc Pension Plan is. The wealth for the beneficiary is earnings, investments and inheritance.

Acer Investment Group LLC has been maintaining documents evidencing who the participant of the Riverside Associates Defined Benefit Plan is. The wealth for the participant is earnings and investments.

Acer Investment Group LLC has been maintaining documents evidencing who the participant of the Linden Associates Defined Benefit Plan is. The wealth for the participant is earnings and investments.

Acer Investment Group LLC has been maintaining documents evidencing who the participant of the D W Construction Inc Retirement Plan is. The wealth for the participant is earnings and investments.

utility/bank statements sent in seperate email

minutes from meeting will come as soon as possible

revised acct docs for newp will come asap

From: Howard, Marcus (LDN) [mailto:mhoward@edfmancapital.com]
Sent: Monday, July 02, 2012 3:16 AM
To: Stacey Kaminer
Cc: mhoward@edfmancapital.com ('mhoward@edfmancapital.com')
Subject: Update summary, ACER

Hi Stacey,

Please see the below update re your account openings.

Kind regards
 Marcus

American Investment Group of New York, L.P. Pension Plan	KYC COMPLETE. Waiting signed doc:
Kamco, L.P. Profit Sharing Plan FBO Stacey Kaminer	KYC COMPLETE. Waiting signed doc:
Acer Investment Group, LLC Retirement Plan FBO Robert V. Crema	KYC COMPLETE. Waiting signed doc:
Moirra Associates, LLC 401(k) Plan	KYC COMPLETE. Waiting signed doc:
The Goldstein Law Group PC 401K Profit Sharing Plan FBO Sheldon and Scott Goldstein	KYC COMPLETE. Waiting signed doc:
Kamco Investments Inc. Pension Plan	Stacey to confirm that Acer Investm documents evidencing who the Part each [plan above are. Also, can Stac each of the plans' Participants
Riverside Associates Defined Benefit Plan	Stacey to confirm that Acer Investm documents evidencing who the Part each [plan above are. Also, can Stac

Comrie, Svetlana (LDN)

From: Comrie, Svetlana (LDN)
Sent: 02 July 2012 09:50
To: Howard, Marcus (LDN)
Subject: RE: Please can you confirm what is Completed below from a KYC perspective
Attachments: RE: Acer Accounts - outstanding items; FW: Newsong Fellowship Church 401(k) Plan

Hi Marcus

Pls see my comments.

From: Howard, Marcus (LDN)
Sent: 21 June 2012 15:58
To: Comrie, Svetlana (LDN)
Cc: Howard, Marcus (LDN)
Subject: Please can you confirm what is Completed below from a KYC perspective

American Investment Group of New York, L.P. Pension Plan	Approved pending funds
	See email of 22 May: Stacey Kaminer to con LLC has been maintaining documents evider ultimate beneficial owners – for each [plan a advise on source of wealth for each of the p
Kamco Investments Inc. Pension Plan	
Kamco, L.P. Profit Sharing Plan FBO Stacey Kaminer	Approved pending funds
	See email of 22 May: Stacey Kaminer to con LLC has been maintaining documents evider ultimate beneficial owners – for each [plan a advise on source of wealth for each of the p
Linden Associates Defined Benefit Plan	
	See email of 21 June. The last item outstand (in the account opening form) have not been customer to complete
Newsong Fellowship Church 401(k) Plan	
	See email of 22 May: Stacey Kaminer to con LLC has been maintaining documents evider ultimate beneficial owners – for each [plan a advise on source of wealth for each of the p
Riverside Associates Defined Benefit Plan	
Acer Investment Group, LLC Retirement Plan FBO Robert V. Crema	Approved pending funds
Moir Associates, LLC 401(k) Plan	Approved pending funds
	See email of 22 May: Stacey Kaminer to con LLC has been maintaining documents evider ultimate beneficial owners – for each [plan a advise on source of wealth for each of the p
D W Construction, INC Retirement Plan	
	According to your email to me of 29 June th minutes from the last Board meeting to evic
Congregation Machon Tiferes Bachurim	
Congregation Khal and Beth Medrash Zichron Yaakov Inc	Utility bill for Gloria Adler (my email of 21 Ju
Newsong Fellowship Church	Not in CBS??? Or I am going mad...
Zichron Yaakov Institute	Address verification for Ida Bobrowsky (my e
The Goldstein Law Group PC 401K Profit Sharing Plan FBO Sheldon and Scott Goldstein	Approved pending funds

Kind regards
 Marcus

Comrie, Svetlana (LDN)

From: Comrie, Svetlana (LDN)
Sent: 22 May 2012 16:33
To: Howard, Marcus (LDN)
Cc: Foster, Victoria (LDN); Koutsopoulou, Evita (LDN); Heath, Sharon (LDN)
Subject: RE: Acer Accounts - outstanding items

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3. Riverside Associates Defined Benefit Plan
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Cc: Foster, Victoria (LDN); Koutsopoulou, Evita (LDN); Heath, Sharon (LDN)
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 - a. There is no document on file to evidence that Darren Wittwer is the Participant (ie ultimate beneficial owner) of the Retirement Plan. Can you please provide a copy of that document.
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Thank you
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Svetlana Comrie
Compliance

ED&F Man Capital Markets Limited
Cottons Centre, Hay's Lane, London, SE1 2QE
Direct: +44 (0)203 580 7055
scomrie@edfmancapital.com | www.edfman.com



Please consider the environment before printing this e-mail

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Sent: 22 May 2012 16:33
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Cc: Foster, Victoria (LDN); Koutsopoulou, Evita (LDN); Heath, Sharon (LDN)
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Compliance

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scomrie@edfmancapital.com | www.edfman.com

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